



To: Francine Torres  
National Organic Program  
USDA-AMS-TMP-NOP  
1400 Independence Ave., SW  
Room 4008-So, Ag Stop 0268  
Washington, DC 20250-0200

Re: Approve Ferric Phosphate for use in organic farming.

Date of Review: February 28th – March 3, 2005

As an organic grower I'm encouraging you to approve Ferric Phosphate for inclusion on the National List and use in organic farming. I am against the two TAP reviewer's recommendations not allowing Ferric Phosphate for use as a molluscicide. Ferric Phosphate occurs naturally in soil and has no known harmful effects on other organisms. Current organically approved methods cited as alternatives are not practical for organic farming.

We operate an organic apple farm of 80 acres in Watsonville, California. Slugs and snails are major pests on our farm. Economic losses from slug/snail damage are often in excess of \$250 acre in a given year. We have heard from our competitors in Europe that Ferric Phosphate has been approved there and is in widespread use. In addition we are facing exclusion from certain markets because of the difficulty of identifying and removing very small snail from our products.

Currently, there are no effective organically approved slug/snail control methods. Other methods such as copper banding, trapping, decoy plantings or diatomaceous earth are neither practical nor effective on a production farm of this acreage and do not significantly reduce slug/snail damage within the field. We do use some of these methods on our farm, but they are not effective.

Organic growers need to have effective tools at our disposal. Lack of an organic slug and snail bait costs us money every year. Please ensure that Ferric Phosphate is approved for use as a molluscicide in organic farming.

Sincerely,

Jim Rider

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